

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

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|-------------------------------------|---|--------------------------------|
| 1) VIDEO GAMING TECHNOLOGIES, INC., |) | |
| |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Case No. 4:17-cv-00454-GKF-jfj |
| |) | |
| 1) CASTLE HILL STUDIOS LLC |) | |
| (d/b/a CASTLE HILL GAMING); |) | |
| 2) CASTLE HILL HOLDING LLC |) | |
| (d/b/a CASTLE HILL GAMING); and |) | |
| 3) IRONWORKS DEVELOPMENT, LLC |) | |
| (d/b/a CASTLE HILL GAMING) |) | |
| |) | |
| Defendants. |) | |

PLAINTIFF’S MOTION TO SEAL

Pursuant to Local Rule 79.1, General Order In Re The Use of Confidential Information In Civil Cases (“GO 08-11”), and paragraph 2(f) of the Stipulated Protective Order (Dkt. 55), Plaintiff Video Gaming Technologies, Inc. (“VGT”), hereby requests that the Court enter an order to seal Plaintiff’s unredacted Response to Defendant’s Motion to Extend Scheduling Order Deadlines (“the Response”) and Exhibit D to the Response (Dkts. 66, 66-4). In support of this motion, Plaintiff states the following:

1. Exhibit D to the Response consists of an excerpt from the deposition of Aaron Milligan that is referenced in the Response. Pursuant to paragraph 2(c) of the Stipulated Protective Order (Dkt. 55), counsel for Defendants may seek to designate portions of Mr. Milligan’s deposition transcript as Confidential Information, Highly Confidential Information, or Highly Confidential Source Code Information within thirty (30) days of receipt of the deposition

transcript or copy thereof. Until the expiration of this thirty-day period, the entire deposition transcript is treated as Highly Confidential Source Code.

2. Because this thirty-day period has not yet expired for the deposition transcript of Mr. Milligan, both the Response and Exhibit D to the Response contain information that must currently be treated as confidential Highly Confidential Source Code. In the event that Defendants do not designate the attached pages of Milligan's deposition transcript as confidential, VGT intends to file unredacted versions of the Response and Exhibit D to the Response.

3. In accordance with Local Rule 79.1, GO 08-11, and the Stipulated Protective Order, Plaintiff has filed both a public, Redacted Response to Defendant's Motion to Extend Scheduling Order Deadlines, *see* Dkt. 65, and a supplemental, unredacted Response (Dkt. 66).

WHEREFORE, Defendants respectfully request that the Court enter an Order granting sealing the Response and Exhibit D to the Response (Dkts. 66, 66-4).

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March 9, 2018

Respectfully submitted,

/s/ Gary Rubman

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CERTIFICATE OF SERVICE

I hereby certify that on March 9, 2018, I filed the foregoing via CM/ECF, which caused the foregoing to be served on the following counsel for Defendants:

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